

EXHIBIT 4

Kropf, Sara

From: Terry Collingsworth [tc@iradvocates.org]
Sent: Tuesday, February 08, 2011 7:51 PM
To: Kropf, Sara
Cc: <garve@iveylawyers.com>; Jeffress, William; Super, David; Kadagathur, Sheila; <TDavis@starneslaw.com>; <TWells@starneslaw.com>; <EHager@conradscherer.com>; <CL@conradscherer.com>; <st@conradscherer.com>
Subject: Re: Search terms and other discovery

Ok fine. Let me know when we can expect the documents.

Terry Collingsworth
202-543-5811
202-255-2198 (cell)

On Feb 8, 2011, at 4:25 PM, <sara.kropf@bakerbotts.com> wrote:

Terry:

We will include the following terms:

1. Siberia
2. El Hatillo Path
3. Pacho Prieto Path
4. Troncal de Caribe
5. Vereda al Paraiso

Sara

From: Terrence Collingsworth [mailto:tc@iradvocates.org]
Sent: Tuesday, February 08, 2011 4:20 PM
To: Kropf, Sara; Garve Ivey
Cc: Jeffress, William; Super, David; Kadagathur, Sheila; TDavis@starneslaw.com; TWells@starneslaw.com; 'Eric Hager'; Christian Levesque; Susana Tellez
Subject: Re: Search terms and other discovery

Sara, following up on your letter today, we appear to be in agreement on the issues. There are only a few specific references to street names that we would like to include:

- Para. ¶ 24 - on an unmaintained road known as Siberia in Bosconia, Cesar
-Para. ¶ 25 - on an unmaintained road known as Siberia in Bosconia, Cesar
-Para. ¶ 33 - El Hatillo Path in Rinconhondo, Cesar
-Para. ¶ 39 - Pacho Prieto Path in Chiriguana, Cesar
-Para. ¶ 76 - an un-maintained highway called "Troncal de Caribe" in El Cruce de la Loma, Cesar
-Para. ¶ 100 - Vereda al Paraiso in the municipality of Augustin Codazzi

Please confirm that the search terms are finalized and that you have started the process.
Cheers, Terry

From: Terrence Collingsworth <tc@iradvocates.org>
Date: Fri, 04 Feb 2011 15:06:29 -0500
To: <sara.kropf@bakerbotts.com>, Garve Ivey <garve@iveylawyers.com>
Cc: William Jeffress <william.jeffress@bakerbotts.com>, <david.super@bakerbotts.com>, <sheila.kadagathur@bakerbotts.com>, <TDavis@starneslaw.com>, <TWells@starneslaw.com>, 'Eric Hager' <EHager@conradscherer.com>, Christian Levesque <CL@conradscherer.com>, Susana Tellez <st@conradscherer.com>
Subject: Search terms and other discovery

February 4, 2011

By Email

William Jeffress
Sara Kropf
Baker Botts
The Warner
1299 Pennsylvania Ave. NW
Washington, DC 20004-2400

Dear Bill and Sara,

This responds first to Sara's letter of January 28 regarding search terms. Using the same numbering system for the points as in Sara's letter, I will only discuss the items we are unclear about or have a dispute:

1. Please confirm the date from which you will be searching, and when we can expect this to occur. I'm particularly concerned about the reference to also searching for hard copy documents as I expected to have received them by now as they are not dependent upon the search terms.

7. We cannot assess our position until you confirm what terms you intend to include.

8. We have a serious concern here that we know that we don't know the names of the many other AUC paramilitaries who were operating in the area of Drummond's operations. Surely you are not taking the position that we only get documents for paramilitaries we know about? We are prepared to take this one to the Court. Please confirm your position.

9. How about a compromise in asking for the full name and the first name and the last paternal name – i.e. search for Israel Alberto Roca Martinez and Israel Roca.

14. As you know, since you asked us in No. 14 of the Second Set of Interrogatories about our allegations in paragraphs 215 and 243 that Drummond raised funds from other businesses to support the AUC, we do fairly allege that our companies are involved in supporting the AUC in coordination with Drummond. Thus, our request for any documents that would show this is relevant. We are prepared to go the Court on this. Please confirm your position.

15. We are willing to agree that a search for towns might be too broad, but a search for specific streets we mention as places where killings occurred would be specific enough to possibly identify reports of the incidents. Please let us know if you will do this.

Let us know as soon as possible your final position on these issues. Please also:

- Confirm when we will get the hard copy documents and when the search for electronic documents will be completed.
- Let me know when we will get your revised discovery responses. As you know, you made numerous concessions at our January 13, 2011 meet and confer, and we expected to have received the new information by now.

I look forward to your response. We are concerned that further delay will hinder our stated plan to depose the Drummond witnesses in a timely manner since we must have the documents before we can depose them.

Sincerely, Terry Collingsworth

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